IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Alexandria Division)

ASSOCIATED RECOVERY, LLC,	
Plaintiff,) Case No. 1:15-cv-01723-AJT-JFA
v.)
JOHN DOES 1-44,	
Defendants in rem.)

In re:

744.COM	LNM.COM	VGJ.COM	YQT.COM
028.COM	LUOHE.COM	WYD.COM	YRN.COM
3DCAMERA.COM	MEQ.COM	XAQ.COM	YTE.COM
FNY.COM	OCU.COM	XFF.COM	YYG.COM
FX2.COM	PIXIE.COM	XSG.COM	ZDP.COM
FXF.COM	QMH.COM	YCX.COM	ZHD.COM
JTZ.COM	RUTEN.COM	YEY.COM	ZULIN.COM
KGJ.COM	SDU.COM	YGX.COM	ZZM.COM
KMQ.COM	SQG.COM	YJR.COM	
KOU.COM	TAOLV.COM	YJX.COM	
KXQ.COM	UHW.COM	YLZ.COM	
KXW.COM	VCZ.COM	YQP.COM	

<u>DECLARATION OF ZUNXUAN CHEN IN SUPPORT OF</u> CERTAIN DEFENDANTS' MOTION TO SET ASIDE THE DEFAULT JUDGMENT

- I, Zunxuan "Digger" Chen, declare as follows:
- 1. I am an attorney in the Dallas office of the law firm of Dentons US, LLP, which represents some of the parties to this Action.
 - 2. I am fluent in both spoken and written Mandarin Chinese as well as English.
- 3. I assisted in communicating with the Chinese parties represented by my firm, including those now moving to set aside the default judgment.
- 4. Communications with the Chinese parties were complicated by their unfamiliarity with legal proceedings of this kind and negotiations for them to retain U.S. legal counsel.
- 5. Communications with the Chinese parties were further complicated by Chinese New Year festivities, which occurred during February 7-13, 2016, and during which time almost all Chinese take off from work and businesses close.
- 6. Furthermore, our firm needed to communicate through a third party agent in China who located and then established communications with the owners of the domain names that are the subject of this motion. Although these communications were diligently pursued, there were inevitable delays due to communication challenges, time zone differences, and difficulties in conveying the import of the filings before this Court.
- 7. I am unaware of any bad faith by any party in delaying a response to this case. To the contrary, I believe that, once notified and appreciative of this matter, the Chinese parties did not delay their decision-making to respond before this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2016.

Zunxuan "Digger" Chen